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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CHRISTOPHER WILLIAMS, SAM
ALBURY, and SHAIA BECKWITH
SIMMONS, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A. and WELLS
FARGO & CO.,

Defendants.

Case No. 3:22-cv-00990-JD

The Hon. James Donato

**JOINT STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE AND RELATED DEADLINES**

Complaint Filed: February 17, 2022

FAC Filed: April 14, 2022

Pursuant to Civil Local Rule 6-2, Plaintiffs Christopher Williams, Sam Albury, and Shaia Beckwith Simmons (“Plaintiffs”) and Defendants Wells Fargo Bank, N.A. and Wells Fargo & Co. (collectively “Wells Fargo”) hereby stipulate as follows:

RECITALS

WHEREAS, on February 17, 2022 Plaintiff Williams filed the Complaint in this action against Wells Fargo in the Northern District of California, San Francisco Division;

WHEREAS, on April 14, 2022, Plaintiffs filed their First Amended Complaint;

WHEREAS, on April 26, 2022, the Parties filed a joint stipulation to extend Wells Fargo’s time to respond to the First Amended Complaint from May 5, 2022 until June 3, 2022;

WHEREAS, on May 9, 2022, the Parties filed a joint stipulation to extend Wells Fargo’s time to respond to the First Amended Complaint from June 3, 2022 until June 10, 2022, and to continue the Initial Case Management Conference until sometime after June 10, 2022;

WHEREAS, on May 11, 2022, the Court continued the Initial Case Management Conference to June 16, 2022;

WHEREAS, on June 13, 2022, the Court continued the Initial Case Management Conference to August 11, 2022;

WHEREAS, McGuireWoods’ lead trial counsel Ava Lias-Booker has a week-long jury trial scheduled to begin in *Terry James v. Baltimore Gas and Electric Company* in the Circuit Court for Baltimore City, Maryland, Case No. 24-C-21-000222 on August 8, 2022 and accordingly cannot attend the currently-scheduled Initial Case Management Conference on August 11, 2022 in San Francisco, California;

WHEREAS, the Parties understand the Court’s requirement that lead counsel must attend the Initial Case Management Conference and be prepared to address all pertinent matters;

WHEREAS, the Parties agree to continue the Initial Case Management Conference to September 1, 2022 to accommodate Ms. Lias-Booker’s trial schedule;

WHEREAS, good cause accordingly exists to adjust this date.

STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Wells Fargo through their respective and undersigned counsel that they respectfully request the Court continue the Initial Case Management Conference to September 1, 2022, and adjust the related deadlines set forth in Dkt #52 accordingly.

DATED: July 22, 2022

McGUIREWOODS LLP

By: /s/ Alicia A. Baiardo

Ava Lias-Booker
Alicia A. Baiardo
Jasmine C. Gardner

WINSON & STRAWN LLP

Amanda Groves
Kobi Brinson
Stacie Knight

*Attorneys for Defendants Wells Fargo Bank,
N.A. and Wells Fargo & Company*

DATED: July 22, 2022

STOWELL & FRIEDMAN, LTD.

By: /s/ Suzanne Elaine Bish

Linda D. Friedman
Suzanne Elaine Bish

SANI LAW, APC

Sam Sani

BEN CRUMP, PLLC

Benjamin Crump

Attorneys for Plaintiffs

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

Pursuant to Civil Local Rule 5-1(h)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

By: /s/ Alicia A. Baiardo
Alicia A. Baiardo

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2022, I electronically filed the foregoing document entitled **JOINT STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND RELATED DEADLINES** with the Clerk of the Court for the United States District Court, Northern District of California using the CM/ECF system and served a copy of same upon all counsel of record via the Court's electronic filing system.

Dated: July 22, 2022

By: /s/ Alicia A. Baiardo
Alicia A. Baiardo